STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Mail Stop PV-11 • Olympia, Washington 98504-8711 • (206) 459-6000

May 11, 1992

Brian Jones
ITT Rayonier, Inc.
700 N. Ennis
Port Angeles, Washington 98362

RE: Dangerous Waste Compliance Inspection

Dear Mr. Jones:

Thank you for your assistance during the inspection on February 20, 1992. There were no apparent violations of the dangerous waste regulations noted during the inspection. However, drum management, housekeeping, rain water in the containment areas, and possible oil contamination in two places within the mill were observed. The used oil storage area has a concrete floor and is contained. However, every effort should be made to ensure that oil is not spilled in this area. The used oil/solvent satellite area by the mill main power transformer station has a small amount of oil in the soil in front of the storage area. A follow up inspection was conducted on May 6, 1992 of this satellite area. Your company is hereby requested to test the soil in front of this oil/solvent satellite station for total petroleum hydrocarbon contamination. Also, your company should exercise care in transferring oil and solvents into containers in this area to ensure that no oil is spilled onto the ground. A written procedure should be developed to ensure that proper transfers take place. The company must revisit the barrel management program with improvement as a goal. Likewise, the company should improve their housekeeping in the mill.

If you should have any questions, please call me at (206) 586-0524.

Sincerely,

Marc Crooks

Marc Crooks, P.E.
Supervisor, Groundwood and Sulfite Mills
Industrial Section
Department of Ecology

Enclosure

C:/ITTRAYON/DANGER/COMPLIAN.001

WASHINGTON STATE DEPARTMENT OF ECOLOGY

SOLID AND HAZARDOUS WASTE PROGRAM

INSPECTION REPORT

1. Name and Address of Entity:

ITT Rayonier, Inc.
700 North Ennis
Port Angeles, Washington 98362

ID Number: WAD 000490169

Date and Time of Inspection:
February 20, 1992
0900 - 1230

Phone Number and Contact:

Brian Jones (206) 4573391
Molly Hemmen (206) 457 3391

Date of Inspection Report: May 7, 1992

Type of Inspection and Reason for Inspection: Scheduled - Generator

Inspection Conducted By: Marc Crooks & Don Nelson

Donald V. Nelson
Signature

Marc E Crooks
Reviewer's Signature

2. Description of Facility, Wastes Generated

A. Petroleum Naphtha/Paint Sludge - chromium and lead < 500 ppm, (dangerous waste), was transported by Resource Recovery (WAD 061672812) of Seattle, Washington to Chempro (WAD 000490169) of seattle, Washington for final disposal. There were 8,744 pounds of these material generated in 1989.

B. Fuel oil/petroleum naphtha - cadmium and chrome <100 ppm, (dangerous waste), was transported by Resource Recovery (WAD 061672812) of Seattle, Washington to Chempro (WAD 000490169) of seattle, Washington for final disposal. There were 225.2 pounds of these material generated in 1989.

C. Mineral spirits/petroleum naphtha/paint-low heavy metals-cadmium, (dangerous waste) was transported by Resource Recovery (WAD 061672812) of Seattle, Washington to Chempro (WAD 000490169) of seattle, Washington for final disposal. There were 825.6 pounds of these material generated in 1989.

D. Polyurethane resin-cadmium carbonate, (dangerous waste) was transported by Resource Recovery (WAD 061672812) of Seattle, Washington to Chempro (WAD 000490169) of seattle, Washington for final disposal. There were 9,562.6 pounds of these material generated in 1989.

E. Waste Paint materials containing toluene, xylene, methyl ethyl ketone, and acetone, (dangerous waste), were transported by Safety Kleen Corporation (WAD000712059) of Auburn, Washington to Safety Kleen Corporation (CAT000613893) of El Monte, California for final disposal. There were 387 pounds of these materials generated in 1989.

F. 1,1,1 trichloroethane, (extremely dangerous waste) was transported by Resource Recovery (WAD 061672812) of Seattle, Washington to Chempro (WAD 000490169) of seattle, Washington for final disposal. There were 4,770.4 pounds of these material generated in 1989.

G. Waste petroleum naphtha containing total halogenated organic compounds and lead, (dangerous waste), was transported by Safety Kleen, (ILD051060408), of Elgin, Il to Safety Kleen Corporation (WAD000712059) of Auburn, Washington for final disposal. There were 6,623 pounds of these material generated in 1989.

H. Waste cleaning compound containing halogenated organic compounds and detergents - methylene chloride was transported by Safety Kleen, (ILD051060408), of Elgin, Illinois to Safety Kleen Corporation (WAD000712059) of Auburn, Washington for final disposal. There were 35 pounds of these material generated in 1989.

I. Waste paint material and thinner including toluene, xylene, isobutyl acetate, ethyl 3-ethoxypropionate, acetone, methyl ethyl ketone, methyl isobutylketone, and isopropanol were transported by Safety Kleen Corporation (WAD000712059), Auburn, Washington. Safety Kleen (CAD980894562) and Safety Kleen CAD093459485) were secondary transporters. Each secondary transporters, transported 243 and 81 pounds, respectively to Safety Kleen Corporation (CAT000613893) of El Monte, California for final disposal. There were 324 pounds of these materials generated in 1990.

J. Mineral spirits with toluene, xylene, ethylbenzene, aromatic compounds, 1,1,1 trichloroethane, and tetrachloroethylene contaminated with grease from part washing was transported by Safety Kleen Corporation (WAD000712059) of Auburn, Washington to Safety Kleen Corporation (WAD000712059) of Auburn, Washington for

final disposal. There were 7,601 pounds and 9,700 pounds of these material generated in 1990 and 1991, respectively.

K. Waste cleaning compounds, (cresylic acid, methyl chloride, o-dichlorobenzene, p-dichlorobenzene, m-dichlorobenzene, and complex amine were transported by Safety Kleen Corporation (WAD000712059), Auburn, Washington to Safety Kleen Corporation (WAD000712059), Auburn, Washington for final disposal.. There were 35 pounds of these materials generated in 1991.

3. Description of Inspection

Marc Crooks and Don Nelson arrived on site at 0830 hours. At approximately 0900 hours we went over the dangerous waste inspection checklist and company's records. The paper work was finished and we toured the site. Twenty two photographs were taken of points of interests regarding dangerous waste activities. At approximately 1200 we conducted a exit interview. At 1230 we exited.

4. Special Considerations (Sections refers to attached checklist)

A. ITT Rayonier, Inc. will be switching to a citrus base solvent for part cleaning.

B. Dangerous wastes get unique number when it goes out for testing.

C. Training program for safety will be written to comply with WAC 173-303.200. At the time of the inspection the company had a training plan. However, the plan was not totally tailored to that required by the dangerous waste regulations. The mill has been performing training and will submit written documentation to Ecology related to the dangerous waste requirements.

D. PCB transformers oil is being exchange during each semiannually shutdown.

E. The company will change to weekly inspection schedule for inspecting the container storage areas.

F. Covers will be installed in the near future over the storage areas.

G. The containment area were full of water from a rain that occurred on February 19, 1992.

H. The company recycles lead batteries off site.

I. The company needs to revisit there empty drum control plan.

J. The company needs to improve the housekeeping around the storage areas.

5. Attachments

i. Dangerous waste checklist

ii. Photos 1-22

iii. Form 4 Generator Annual Dangerous Waste Report for 1989, 1990, and 1991.

6. Summary of Violations

There were no apparent violations of the dangerous waste regulations noted during the inspection; however, there were some items such as drum management, housekeeping, rain water in the containment areas, and possible oil contamination around the storage area as indicated in photograph numbers 2, 3, 4, 5, and 6. The area in these photographs are in a containment area with a concrete floor. The used oil/solvent satellite area (Photograph 12) has a small amount of oil in the soil in front of the storage area. This was reconfirmed on a followup visit on May 6, 1992. Instead of taking enforcement action under the dangerous waste regulations for the area noted by photo # 12, it would be preferable to request the company to test this area for total petroleum hydrocarbon contamination within the soils. Also, it would be advised to insist to the company that care in transferring oil and solvents into containers in this area be improved. This approach would be easier to defend since used oil is not a dangerous waste unless it is contaminated with a listed waste. Since there were no samples taken in these areas, there is no proof that the oil was contaminated with a listed waste. Therefore, tested would be appropriate in order to determine the oil levels in the soils.

DANGEROUS WASTE COMPLIANCE CHECKLIST/QUESTIONNAIRE, CHAPTER 173-303 WAC

* *

PART I: COVER INFORMATION

This part of the checklist/questionnaire is applicable to all persons who handle dangerous waste. This cover information includes a review of the Notification Form and confirmation of other general information necessary to maintain accurate files and records.

* *

1. INSPECTOR INFORMATION

WDOE Inspector: Don Nelson Phone #: 206-586-0554

: Marc Crooks : 206-586-0524

Inspector's Signature: Donald V. Nelson

:

Office (circle one): NW SW C E (IND)

Date of THIS Inspection: 2/20/92

Date of LAST Inspection: 4/6/89

Other Inspectors Present: None

Name: ______ Agency: ______ Phone #: ______

: ______ : ______ : ______

2. BUSINESS INFORMATION

Business Name ITT Rayonier, Inc EPA/State ID #: WAD 000490169

Address: P. O. Box 191

Port Angeles, WA

Zip Code: 98362 County: Clallam

Business Location (If: 700 N. Ennis

Other Than Address) Port Angeles, WA 98362

Contact Person: Brian Jones Phone #: 206-457-3391

: Kelly Hennien : 206-457-3391

Were samples taken during the inspection? Yes ___
No ✓

If yes, where and of what were samples taken:

Were samples split with the owner/operator? Yes ___ N/A
No ___

Were chain of custody procedures follows? Yes ___
No ___

DANGEROUS WASTE INSPECTION CHECKLIST

Part 2

- - Generator Inspection Checklist - -

GENERATOR NAME: ITT Rayonier, Inc

INSPECTOR: Marc Crooks
Don Nelson INSPECTION DATE: 2/20/92

This part of the checklist applies to any person whose actions or processes generate dangerous wastes as defined in Chapter 173-303 WAC.

Because WAC 173-303-120 and 500 through 525 provide special requirements for recyclable materials, a separate checklist, Part 5 - Recycling Standards Inspection Checklist, is provided for generators who produce dangerous wastes which are recycled.

THE GENERATOR CHECKLIST IS COMPOSED OF FIVE SECTIONS:

Section A - Dangerous Waste Determination/Notification
Section B - Requirements for Small Quantity Generators
Section C - General Requirements for Dangerous Waste Generators

- **Container Requirements**
- **General Inspection Requirements**
- **Manifesting and Pretransport Requirements**
- **Preparedness and Prevention Requirements**
- **Reporting**
- **Spills and Discharges**
- **Importing/Exporting Dangerous Waste**

Section D - Requirements For Medium Quantity Generators (220 to 2200 lbs/month or batch)

Section E - Requirements For Large Quantity Generators (greater than 2200 lbs/month or batch)

- **Personnel Training**
- **Contingency Plans and Emergency Procedures**

To complete this checklist, enter the following codes at the right margin as applicable:

Y = YES	NA = NOT APPLICABLE
N = NO	C = SEE COMMENT

Comments can be entered either at the bottom of each page or on separate pages. Blank pages are provided for comments at the end of this checklist.

Y = Yes	N = No
NA = Not Applic's	
C = See Comment	

5. Does the generator generate state-only carcinogenic wastes? N

   If yes, was this waste designated under section 084(7) or 103?

6. Are any other solid wastes generated at this site which have not been designated, but which the inspector believes may be dangerous wastes? N

   If yes, list solid wastes and describe processes from which they are generated.

7. Has the generator properly designated all dangerous wastes DW or EHW? Y

8. Has the generator assigned all applicable dangerous waste numbers to his/her waste streams, and used all applicable dangerous waste numbers on manifests, annual reports, land disposal restriction notices and certifications, etc.? Y (C1)

9. If designation involved performing tests and analyses of the wastes:

   a) Does the generator have on-site, or have ready access to, equipment for obtaining and preserving waste samples for tests? (C2) ~~NA~~

   b) Do the waste analyses and test results provide enough information to accurately designate the generator's dangerous wastes? Y

   c) Does the generator retain copies of all waste analyses used to designate his dangerous wastes for a minimum of five years? [210(3)] Y

10. Has the generator determined appropriate QELs for all waste streams? Y

(C1) Got unique # when it goes out for testing

(C2) Columbia Analytical does testing in Kelso, WA

Y = Yes	N = No
NA = Not Applicable	
C = See Comment	

SECTION B - REQUIREMENTS FOR SMALL QUANTITY GENERATORS

SMALL QUANTITY GENERATORS [070(8)]

Complete questions 1 through 4 below only if the generator is a small quantity generator.

1. Does the generator treat or dispose of dangerous waste in an on-site facility? N/A

2. Does the generator ensure delivery to an off-site facility which is:

   a. Permitted under WAC 173-303-800 through 840?

   b. Authorized to manage dangerous waste by another state with a hazardous waste program approved under 40 CFR Part 271, or by EPA under 40 CFR Part 270?

   c. Permitted to manage moderate-risk waste under Chapter 173-304 WAC (Minimum Functional Standards for Solid Waste Handling), operated in accordance with state and local regulations, and consistent with the applicable local hazardous waste plan that has been approved by the department?

   d. Permitted to manage municipal or industrial solid waste in accordance with state or local regulations, or in accordance with another state's solid waste laws if the waste is sent out of state?

3. Does the generator send his waste to a facility which will beneficially use, reuse, legitimately recycle, or reclaim the waste, or that will treat the waste prior to recycling it?

4. If the generator currently has an ID number, does s/he submit a Generator Annual Dangerous Waste Report, Form 4?

Note: If "yes" was answered to question 4, and one of the following: 1, 2a, b, c, d, or 3, you need not continue on with the remainder of this checklist.

Y = Yes N = No
NA = Not Applicable
C = See Comment

j) Are containers opened, handled, or stored in a manner which will not damage the integrity of the drum? [630(5)(b)] — Y

k) Is a distance of 30 inches maintained between aisles of containers holding dangerous waste? [630(5)(c)] — Y

l) Are container storage areas inspected in least weekly? [630(6)] — C1

m) Was the container storage area put into use after September 30, 1986? [200(1)(b) and 630(7)] — Y

If yes,

1) Does the container storage area have an impervious base (free of cracks or gaps) that is designed to collect and hold spills and leaks? — Y

2) Is the base sloped or otherwise designed to drain and remove liquids from leaks, spills, or precipitation? — Y

3) Are uncovered storage areas capable of holding the additional volume that would result from the precipitation of a maximum twenty-five year storm of twenty-four hours duration? — C2

4) Is the containment area designed for positive drainage control (such as a locked drainage valve)? — Y

5) For storage areas with containers holding free liquids, or F020, F021, F022, F023, F026, or F027 waste, does the containment system have sufficient capacity to contain ten percent of the volume of all containers or the volume of the largest container, whichever is greater? — N

6) Is run-on into the containment system prevented? — N

7) Are containers holding EHW protected from the elements by means of a building or other protective covering? — N(C3)

(c1) will change to weekly inspections

(c2) Covers will be installed in near future at the storage area

(c3) Water containment from storm on 2/19/92 will be tested and pumped out on ~~the~~ 2/21/92 into a tote bin. The containment with the water in it will

Y = Yes N = No
NA = Not Applicable
C = See Comment

s) Are containers holding dangerous wastes that are incompatible with wastes or materials stored nearby kept separate from those wastes or materials by means of a dike, berm, wall, or other device? [630(9)(c)] N

Note: For generators storing dangerous waste in tanks, complete Part 7 of the Dangerous Waste Inspection Checklist.

GENERAL INSPECTION [320]

2. Does the generator maintain a written schedule at the facility for inspecting:

a) Monitoring equipment? Y

b) Safety and emergency equipment? Y

c) Security devices? Y

d) Operating and structural equipment that help to prevent, detect, or respond to hazards? Y

3. Does the schedule identify types of problems to look for:

a) Malfunction? Y

b) Operator error? Y

c) Discharges? Y

4. Does the generator maintain an inspection log? Y

If yes, does it include:

a) Date and time of inspection? Y

b) Name and signature of inspector Y

c) Notation of observations? Y

d) Date and nature of repairs or remedial action? Y

(c) The company sends samples out to Columbia analytical

Y = Yes	N = No
NA = Not Applicable	
C = See Comment	

3) Does the manifest consist of enough copies to provide one for the generator, all transporters, and the receiving facility, and an additional copy to be sent back to the generator? Y

4) Does the generator sign and date all manifests? Y

5) Does the generator obtain handwritten signature and date of acceptance from initial transporter? Y

6) Does the generator obtain one copy of the manifest signed and dated by generator and transporter? Y

7) Do returned manifests include facility owner/operator signature and date of acceptance? Y

8) Are completed manifests returned to the generator within 45 days? Y

If no, for those manifests which exceeded the 45 day limit, did the generator submit an exception report to the department which included:

i) A legible copy of the manifest for which the generator does not have confirmation of delivery? NA

ii) A cover letter signed by the generator or his representative explaining the efforts taken to locate the waste and the results of those efforts? NA

9) Does the generator retain copies of all manifests for five years? Y

10) For bulk shipments of dangerous waste within the United States by water, does the generator send three copies of the manifest dated and signed to the designated facility or, if exported by water, to the last water transporter to handle the waste in the U.S.? N

Y = Yes	N = No
NA = Not Applicable	
C = See Comment	

a) Internal communication or alarm system? Y

If yes, is it easily accessible in case of emergency? Y

b) Telephone or two-way radio to call emergency response personnel? Y

c) Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment? Y

d) Water of adequate volume for hoses, sprinklers, or water spray system? Y

Describe source of water: maximum 1500 gal from Ethwa River

e) Are the above items tested or inspected for proper operation? Y (C1)

15. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? Y (C2)

16. Has the generator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) Y

17. In the case that more than one police or fire department might respond, is there a designated primary authority? Y

If yes, name primary authority: Fire Department

18. Does the generator have phone numbers of and agreements with State emergency response teams, emergency response contractors, and equipment suppliers? Y

Are they readily available to all personnel? Y

19. Has the generator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? Y

(C1) 2 times per year

(C2) Fire Department

Y = Yes	N = No
NA = Not Applicable	
C = See Comment	

If no, provide an explanation below (e.g., the spill was to totally enclosed secondary containment, the discharge was permitted under state, federal or local laws or regulations, or simply failure to report).

c) Did the generator take immediate action to protect human health and the environment? NA

d) Describe further action, if any, required by Ecology regarding the spill or dischafge.

IMPORTING/EXPORTING DANGEROUS WASTE [230]

24. Has the generator received from or transported to a foreign source any dangerous waste? W 1

If yes,

a) Has the generator filed a notice with the department? NA

b) Is this waste manifested and signed by a foreign consignee? NA

c) If the generator shipped the waste out of the country, did s/he receive confirmation of delivery of shipment? NA

Y = Yes	N = No
NA = Not Applicable	
C = See Comment	

3). Does the generator ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their assigned responsibilities? NA

Y = Yes	N = No
NA = Not Applicable	
C = See Comment	

e) Do facility personnel participate in an annual review of the training provided in the program? Y

f) Is training given within 6 months of employment or within 6 months of an employee being assigned to a new position? Y

g) Are new employees supervised until they complete the training program? Y

h) Does the training program:

1) Teach personnel to perform their duties in a way that ensures compliance with WAC 173-303? Y (C1)

2) Instruct personnel on contingency plan implementation? Y

3) Familiarize personnel with emergency equipment and systems, and emergency procedures? Y

CONTINGENCY PLAN AND EMERGENCY PROCEDURES [350]

4. Is a contingency plan maintained at the facility? Y

If yes,

a) Is it a revised SPCC (or other emergency) plan? Y

b) Does the contingency plan include:

1) A description of actions facility personnel must take to comply with sections 350 and 360? Y

2) For off-site facilities, a description of actions to be taken upon receipt of an unacceptable dangerous waste shipment which presents a hazard to public health and the environment? Y

3) Arrangements with local emergency response organizations? Y

4) Emergency coordinators' names, phone numbers, and addresses? Y (C2)

(C1) ACC 3(a) 1-3

(C2) Incident commander on site at all times

DANGEROUS WASTE INSPECTION CHECKLIST

-- Narrative Explanation Sheet --

FACILITY NAME: ITT Rayonier, Inc Port Angeles, WA

INSPECTOR: Don Nelson Mark Crooks INSPECTION DATE: 7/19/92

Please indicate which Part, Section, and question number your comments correspond to:

photos #10-11 used oil

photos 12-16 used oil at Brinks